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19 **UNITED STATES DISTRICT COURT**  
20 **CENTRAL DISTRICT OF CALIFORNIA**

21 VERNON UNSWORTH,

22 Plaintiff

23 v.

24 ELON MUSK,

25 Defendant.

Case No. 2:18-cv-08048-SVW (JCx)

Judge: Hon. Stephen V. Wilson

**JOINT STIPULATION TO REQUEST  
AMENDMENTS TO SCHEDULING  
ORDER**

Complaint Filed: Sept. 17, 2018  
Trial Date: Dec. 3, 2019

1 Plaintiff Vernon Unsworth and Defendant Elon Musk (collectively, the  
2 “Parties”) by and through their counsel of record, hereby stipulate pursuant to  
3 Central District of California Local Rules (“L.R.”) 7-1 to request that the Court  
4 amend the Scheduling Order (Docs. 54, 69) (the “Scheduling Order”) to stipulate to  
5 certain expert discovery and to a brief extension of the motion in limine deadlines  
6 with respect to expert discovery, as follows:

7 1. WHEREAS, the Scheduling Order required initial expert disclosures on  
8 or before September 13, 2019 (Doc. 54 Ex. A);

9 2. WHEREAS, Plaintiff Vernon Unsworth disclosed two experts, Eric  
10 Rose (located in California) and Dr. Bernard Jansen (located in Qatar), and served  
11 their expert reports on September 13, 2019;

12 3. WHEREAS, Defendant Elon Musk’s deadline to disclose rebuttal  
13 expert(s) and serve report(s) is October 14, 2019 (*id.*);

14 4. WHEREAS, the Scheduling Order does not state a cut-off for expert  
15 discovery but contains deadlines for motions in limine (*id.*);

16 5. WHEREAS, the current deadlines for all motions in limine is  
17 November 4, 2019, with oppositions to such motions due November 11, 2019, and  
18 replies to such motions due November 18, 2019 (*id.*);

19 6. WHEREAS, the Parties stipulate to the following dates for document  
20 and deposition discovery of Plaintiff’s experts;

21 7. WHEREAS, to accommodate the availability of Plaintiff’s international  
22 expert witness, the Parties seek short extensions of motions in limine briefing  
23 deadlines with respect to expert discovery only;

24 8. WHEREAS, the Parties have acted diligently in attempting to schedule  
25 and complete expert discovery;

26 9. WHEREAS, this is the first request by the Parties (and second by  
27 Plaintiff) to amend briefing deadlines in the Scheduling Order;

1           10. WHEREAS, the amendments requested in this Joint Stipulation will  
2 not delay other scheduled dates, including the filing of all pre-trial filings on  
3 November 18, the final pre-trial conference on November 25, 2019, and the  
4 currently scheduled trial date of December 3, 2019;

5           11. WHEREAS, both Parties agree to the amendment of the Scheduling  
6 Order as set forth herein;

7           NOW THEREFORE, the Parties agree and stipulate to the following:

- 8           1. Plaintiff Vernon Unsworth shall complete his document production for  
9 experts Eric Rose and Dr. Bernard Jansen on or before October 25,  
10 2019;
- 11          2. Plaintiff Vernon Unsworth shall make available for deposition Mr. Eric  
12 Rose on November 1, 2019, at 10:00 a.m. at Defendant's counsel's  
13 offices in Los Angeles, CA;
- 14          3. Plaintiff Vernon Unsworth shall make available for deposition Dr.  
15 Bernard Jansen on November 4, 2019, at 10:00 a.m. at Plaintiff's  
16 counsel's offices in Atlanta, GA;
- 17          4. All deadlines relating to motions in limine excepting such motions  
18 relating to expert testimony shall remain as set forth in the current  
19 Scheduling Order;
- 20          5. The deadline for filings of motions in limine relating to expert  
21 testimony shall be extended from November 4, 2019, to November 8,  
22 2019;
- 23          6. The deadline for filing oppositions to motions in limine relating to  
24 expert testimony shall be extended from November 11, 2019, to  
25 November 14, 2019;
- 26          7. The deadline for filings replies in support of motions in limine relating  
27 to expert testimony shall be extended from November 18, 2019, to  
28 November 21, 2019;

1           8.     In the event Defendant discloses a rebuttal expert(s) on or before  
2                 October 14, 2019, the Parties agree to cooperate in timely completing  
3                 document and deposition discovery of said expert(s), but Plaintiff  
4                 reserves his right to seek an extension of the motion in limine deadline  
5                 for Plaintiff to challenge such expert(s), if necessary.

6           The Parties have submitted herewith a proposed Order for the Court's  
7     consideration to effectuate the agreed-upon requested amendments to the  
8     Scheduling Order.

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10                                 [signature pages follow]  
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1 DATED: October 3, 2019

Respectfully submitted,  
L. LIN WOOD, P.C.

2  
3  
4 By /s/ Lin Wood

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*Attorneys for Plaintiff Vernon Unsworth*

DATED: October 3, 2019

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*Attorneys for Defendant Elon Musk*

Pursuant to L.R. 5-4.3.4(a)(2)(i), the  
filer hereby attests that all signatories  
listed, and on whose behalf this filing is  
submitted, concur in the filing's content  
and have authorized the filing.

/s/ L. Lin Wood